

EXHIBIT 1

**Plaintiffs' More Definite Statement as to
Defendant Wafa Hunamitarian Organization**

1. Plaintiffs hereby incorporate all allegations and counts contained in the Third Amended Complaint in Burnett, et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC), 03 CV 5738 & 03 CV 9849.
2. The Wafa Humanitarian Organization (a/k/a the Wafa Organization, a/k/a Wafa Al-Igatha Al Islamic charity) was headed by Saudi citizen Sheikh Abu Abdul Aziz Nagi ("Nagi"), a high ranking al Qaeda official who was captured in Afghanistan in December 2001.
3. Wafa is a key Saudi charity and Pakistan-based organization financing al Qaeda. Wafa was a militant supporter of the Taliban. Documents found in Wafa's offices in Afghanistan revealed that the charity was intimately involved in assassination plots against U.S. citizens as well as the distribution of "how to" manuals on chemical and biological warfare. Wafa was also instrumental in providing al Qaeda with arms, supplies and logistical support in Afghanistan before and after September 11, 2001. U.S. officials have described Wafa as a key component of Usama bin Laden's organization.
4. Wafa was listed as a Specially Designated Global Terrorist by the United States on September 23, 2001 and had its assets frozen pursuant to Executive Order 13224.
5. According to the The National Commission on Terrorist Attacks Upon the United States, Wafa was one of many charities where "al Qaeda operatives controlled the entire organization, including access to bank accounts." Wafa and other Islamic charities "were a source of money and also provided significant cover, which enabled operatives to travel undetected under the guise of working for a humanitarian organization."
6. According to German intelligence sources, Wafa offices in Pakistan played an important role in facilitating the transfer of money from there to the German Al Tawhid al Qaeda cell. In Afghanistan, the offices of Wafa functioned as an al Qaeda subsidiary until bombed by United States war planes.